



**Graham  
+ Sibbald**

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11<sup>th</sup> April 2011

IMFLDP Call for Sites  
Director of Planning and Development  
Glenurquhart Road  
Inverness  
IV3 5NX

Dear Sirs,

**Inner Moray Firth Local Development Plan Call for Sites  
Land at Sir Walter Scott Drive, Inverness**

I refer to the site as above and as per the attached Call for Sites response form and location plan. Graham + Sibbald has been appointed by the owner of the land marked as Area A on the attached plan. Part of that site is allocated within the current Adopted Local Plan for expansion of the police headquarters, and the remainder is protected open space. Whilst the site has 2 different Local Plan allocations, it appears 'on the ground' as one continuous field. This space is fenced off from the adjoining open space to the immediate south west (which is owned by the Highland Council).

This submission seeks the allocation of the entire site as a development opportunity site - we consider that the site is suitable for a range of **commercial / business / town centre uses including leisure / hotel / retail**.

The site is not used for recreational purposes, and its allocation for development would not set a precedent given that the land to the immediate south west is owned by The Highland Council and it is understood that they wish to retain this site as open space.

I trust the above is of assistance, and please do not hesitate to contact the writer should you wish to discuss.

Yours sincerely,

**Claire Peters**  
**Graham and Sibbald**  
Email: [cpeters@g-s.co.uk](mailto:cpeters@g-s.co.uk)

Tel: 0141 332 1194  
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H.C. PLANNING AND DEVELOPMENT SERVICE	
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**Partners**

IC Gillies FRICS MRICS  
ID Leighton FRICS  
NR Fisher FRICS MRICS  
BJ Devine FRICS  
P McEachran FRICS  
BD Murdoch BSC MRICS  
DS Ross MRICS MRICS  
L McAndrew BSc MRICS  
KA Murchie BSc MRICS  
IR Croall BSc MRICS  
KM Scoble BSc MRICS  
GR Loutit FRICS MRICS  
RW Buchanan DipSurr MRICS  
C Henderson FRICS  
S Buglass BSc FRICS ACARS  
PE Docherty FRICS DipSurr  
CMC McCash BSc MRICS  
MA Wilson BSc MRICS  
AW Dandie FRICS  
G Tonner FRICS  
C Campbell BSc MRICS MRICS  
G Davidson BSc MRICS MRICS  
DC Cameron BSc MRICS MRICS  
J Cropper MRICS MRICS MRICS  
FH Lang BSc MRICS  
S McGarva BSc MRICS MRICS

**Associates**

AP Clerk MRICS ACORN  
K Blair BSc MRICS  
I Johnstone BSc MRICS  
N MacFarlane FRICS DipSurr  
AR Welch BSc MRICS MRICS  
SE Drysdale BSc MRICS MRICS

**Planning Consultant**

I Kelly BSc MRICS DipSurr MRICS

**Consultants**

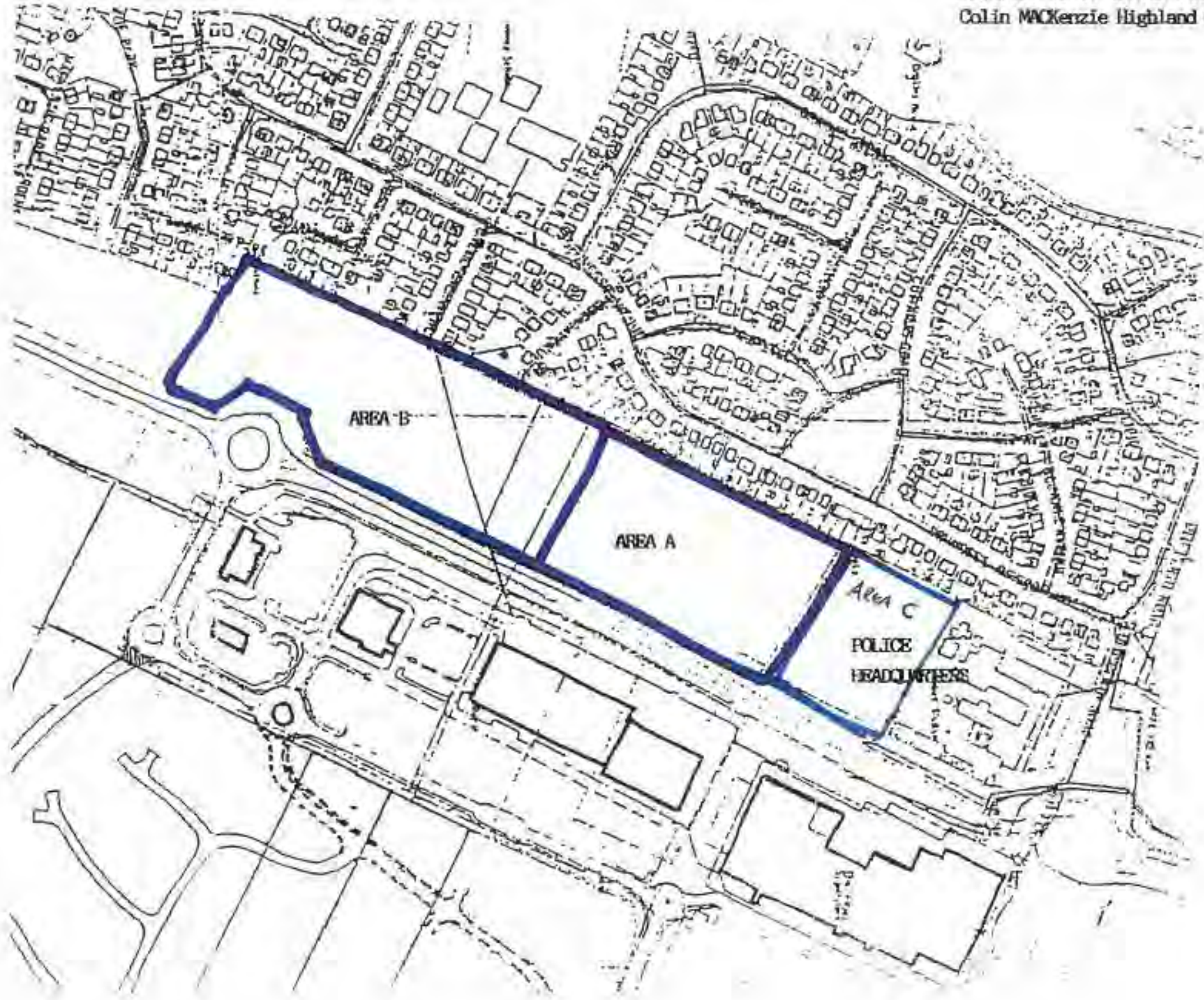
JD Robb FRICS  
JB Christie FRICS



Regulated by RICS  
Chartered Surveyors  
A Quality Assured Firm

LOCATION PLAN

Referred to in letter dated \_\_\_\_\_ to  
Colin MACKenzie Highland Council Local Plans



# INNER MORAY FIRTH • Linne Mhoireibh A-staigh

Call for Sites • Gairm airson Làraich



Where should future building go and which areas should be protected?



January 2011

COMMENCEMENT OF INNER MORAY FIRTH LOCAL DEVELOPMENT PLAN **Faoilleach 2011**

## Purpose

We are seeking your suggestions on which land, in the next 10 years, should be built on and which areas should be protected across the Inner Moray Firth (as shown on the map below).



## Who Should Respond to the "Call for Sites"?

Anyone that in the next 10 years may wish to:

- promote a building project for any kind of development (we are particularly inviting larger scale proposals - e.g. 10 or more houses), and/or;
- safeguard an area of cherished public open space from building.

## Easy Read Guide

This document is written for the general public. *Landowners, developers, agents and those interested in the complexities of the development process should also read the technical information on page 3 and further material available via the Council's web-site [www.highland.gov.uk](http://www.highland.gov.uk).*

## Why Is It Important to Make Suggestions?

This *Call for Sites* is the first step in producing a document called the Inner Moray Firth Local Development Plan (the *Plan*). This *Plan* and other Highland local development plans are important because they tell people where the Council is likely to support planning applications and where it is not. You may have already heard about the Highland wide Local Development Plan. This provides the "bigger picture" on development across Highland. The *Plan* will provide the local detail. These documents therefore affect the use and value of land and property. They are also a factor in public investment decisions - for example - new sewers, new schools and new bus routes will follow the location of new development.

## How do I Submit My Suggestions?

Please write down your ideas and send them to us - do this by filling in the *Site Forms* for each parcel of land you have a suggestion for.

## How do I Fill in the *Site Forms*?

We need as much information as possible to decide whether your suggestions should be included in the Council's *Plan*. The better the reasons for the site's inclusion then the more chance it will be included.

### Please:

- use separate *Site Forms* for each site suggested;
- draw the boundary of the site you're suggesting on a map and attach this to the *Site Forms* (try and use a detailed Ordnance Survey base map if at all possible (these can be purchased from <http://maps.blackwell.co.uk/> or if your site is within or close to a large village or town then photocopy one of our existing local plan maps (available via: <http://www.highland.gov.uk/yourenvironment/planning/developmentplans/localplans/> and add your suggestion) although a hand drawn map will suffice);
- note we can't keep your suggestion confidential because this is a public process;
- note however we will redact (exclude or blackout) all private phone numbers, e-mail addresses and signatures from whatever you send in before it can be seen by others;
- provide full contact information so we can come back to you if we need to clarify anything.

### **When & Where Should I Submit my Suggestions?**

Please send your completed *Site Forms* and maps to be received by 29<sup>th</sup> April 2011 to:

IMFLDP *Call for Sites*  
Director of Planning and Development  
Glenurquhart Road  
Inverness  
IV3 5NX

Or preferably by e-mail to:  
[imfldp@highland.gov.uk](mailto:imfldp@highland.gov.uk)

### **What Happens After I've Submitted My Suggestions?**

We will:

- let you know we have received your suggestion and then compare and assess it against others and information we have collected (about the area's building needs and constraints to building);
- then produce the first draft of the *Plan* called a *Main Issues Report* which will contain options for sites to be built on or safeguarded from building - you can then see whether your ideas have been included or not;
- invite views on these site options;
- then decide which of the options to keep;
- invite objections to any of the sites the Council has decided to keep - you can object at this point if your site suggestion has not been included or kept;
- refer objections to an independent person (a Scottish Government appointed *Reporter*) for him/her to test the merits of the views of objectors and the Council about each contested site, and;
- produce the finished *Plan* including the changes recommended by the *Reporter*.

As you can see the current "*Call for Sites*" is only the start of a relatively long process. You will not get a final answer to your suggestion for 2-3 years.

### **Why Does it Take so Long to Decide Where to Build?**

This is because the *Plan* is a statutory document. As such, it involves several chances for anyone with an interest in the environment around us to have their say whether for or against. Also to ensure

fairness, objections are heard and decided upon by a person independent of the Council and objectors.

### **What Should I do if I Want a Quicker Answer to My Building Suggestion?**

You should consider lodging a planning application. However, large scale building proposals that don't have any support within the Council's existing *Plan* have less chance of obtaining planning permission. There is no Council fee to submit your suggestions on the *Plan* so responding to the "Call for Sites" is particularly suitable for those landowners looking at development potential in the longer term but who do not want to incur the cost and risk of a planning application.

### **Site Forms**

**Fill in and return one of the forms below for each site suggestion (remember to append a map for each and continue on separate sheet(s) if necessary). The forms are available on the Council's web-site and can be e-mailed to anyone who requests them by phoning the number below.**

### **Queries**

If you would like further information or have any other queries please contact Tim Stott on 01463 702265 or e-mail [imfldp@highland.gov.uk](mailto:imfldp@highland.gov.uk)

### **Further Information**

The Council's web-site [www.highland.gov.uk](http://www.highland.gov.uk) (search for "imfldp") will provide comprehensive information on the *Plan* throughout its progress.

This "Call for Sites" is the first step in the Council's production of a detailed local development plan for the Inner Moray Firth. The area covered by the *Plan* stretches from Tain round to Nairn and as far south as Fort Augustus and the Cairngorms National Park boundary. The western boundary encloses Garve and Strathconon.

For larger and more complex development proposals requiring the submission of more information, landowners, developers and/or agents may wish to copy and expand the forms which are available as Word or Excel templates on the Council's web-site.

It is proposed that the *Plan* will have a streamlined format and will therefore focus mainly on larger development proposals and areas to be safeguarded in the main towns and villages in the area. We welcome other site suggestions in other smaller places but these ideas may be redirected to our Area Offices so they can offer advice prior to the submission of any planning application.

Landowners, developers and/or agents do not need to suggest sites which are already allocated in an adopted local plan unless they wish to suggest a material change to the nature of that allocation - e.g. they wish to increase the site's capacity, amend the boundary, change the use or uses of the site or reduce listed developer requirements. The *Plan* will carry forward the principles and fill in the detail of the Highland wide Local Development Plan (as approved post Examination).

## Site Forms

YOUR DETAILS	
Your Name (and organisation if applicable)	MR + MRS GRANT
Your Address / Contact Details	OLD EDINBURGH ROAD SOUTH INVERNESS IV2 6AR
Landowner's Name (if known / applicable)	AS ABOVE
Agent (if applicable)	GRAHAM + SIBBALD
Agent's Address / Contact Details (if applicable)	18 NEWTON PLACE GLASGOW G3 7PY

DETAILS OF SITE SUGGESTED	
Site Address	LAND AT SIR WALTER SCOTT DRIVE
Site/Local Name (if different from above)	
Site Size (hectares)	2.1 HECTARES
Grid Reference (if known)	
Proposed Use (e.g. housing, affordable housing, employment, retail, waste, gypsy traveller, utility, community, retained public open space)	COMMERCIAL AND / OR RETAIL AND / OR BUSINESS AND / OR LEISURE / HOTEL USE
Proposed Non Housing Floorspace / Number of Housing Units (if known/applicable)	NOT CONFIRMED AT THIS STAGE
Map	(please attach a map of the site ideally on an Ordnance Survey base)

If you wish to suggest a site that should <u>not</u> be built on, fill in this form	
REASONS WHY YOUR SITE SHOULD BE SAFEGUARDED FROM BUILDING	
How do the public enjoy the space - e.g. used for dog walking, children's play?	/
What makes the site more special than other areas in the village/town?	/
Does the site have attractive or rare features such as mature trees, historical significance or protected wildlife?	/

Landowners, developers and/or agents wishing to suggest a site should fill in the following form and as much as possible of the strategic environmental assessment form (at the end of this document) which assesses the environmental effects of possible development sites.

If you wish to suggest a site that should be built on, fill in this form	
REASONS FOR YOUR DEVELOPMENT SITE SUGGESTION	
How can the site be serviced? (give details of proposed access, foul drainage, surface water and water supply arrangements)	PUBLIC SEWER / MAINS WATER etc EXPECTED TO BE ACCEPTABLE DUE TO LOCATION IN BUILT-UP AREA VEHICULAR ACCESS OVER RETAINED RIGHT OF ACCESS FROM UNUSED SPUR OF DELLFIELD OF INSHES ROUNDABOUT
FORM CONTINUES BELOW	

REASONS FOR YOUR DEVELOPMENT SITE SUGGESTION

<p><b>What are the site's constraints and how can they be resolved or reduced?</b>          (e.g. does the site flood, are there protected species present, will good farmland be lost, will the local landscape be affected, will valued trees be felled, are any other heritage features likely to be affected?)</p>	<p>NO KNOWN CONSTRAINTS.</p>
<p><b>What benefits will result to the wider community from the site's development?</b>          (e.g. will there be more or better jobs, will the land be put to a more productive use, will the development increase infrastructure capacity for others, will more affordable houses result, is there an unmet demand for the development?)</p>	<p>ENHANCED LOCAL FACILITIES</p>
<p><b>What impact will there be on travel patterns from the site's development?</b>          (e.g. will more or less people engage in active and healthy travel (walk / cycle) or go by public transport as a result of the site's development rather than travel by private car?)</p>	<p>NO SIGNIFICANT IMPACTS - SITE WITHIN AN AREA WITH MIX OF RESIDENTIAL AND RETAIL NEARBY</p>
<p><b>Is the site well connected?</b>          (e.g. will the average travel time to community and commercial facilities reduce or increase as a result of the site's development, is the proposed use compatible with existing / proposed surrounding uses?)</p>	<p>WELL CONNECTED WITH REGARD TO FOOTPATH LINKS, &amp; WITHIN WALKING DISTANCE OF A RANGE OF FACILITIES</p>
<p><b>Is the site energy efficient?</b>          (e.g. will the site allow for energy efficient siting, layout, building design and local renewable energy source connection?)</p>	<p>CAN BE CONSIDERED AT DETAILED APPLICATION STAGE</p>
<p><b>What other negative impacts will the development have and how will they be resolved or offset?</b>          (e.g. will the site's development increase any form of pollution or decrease public safety?)</p>	<p>NO OTHER APPARENT NEGATIVE IMPACTS.</p>



## STRATEGIC ENVIRONMENTAL ASSESSMENT FORM

Landowners, developers and/or agents wishing to suggest a site should fill in as much as possible of the following form. Strategic environmental assessment of local development plan sites is now a statutory requirement and considers the possible environmental effects of development proposals. We will check your answers and fill in any gaps.

No.	Issue	Detailed Explanation	Answer	Any Proposed Mitigation Measures (how will you reduce or offset the effects of your development?)
1	a) Will the site safeguard any existing open space within the area?  b) Will the site enable high quality open space to be provided within the area?	Will the site have any impact on useable public open space (such as parks, playing fields etc) or any opportunities to create additional public open space?	NO - SITE IS PARTIALLY CLASSED AS OPEN SPACE IN ADOPTED LOCAL PLAN, BUT SERVES NO AMENITY/ RECREATION PURPOSE.	
2	Will the site encourage and enable provision for active travel (walking, cycling and public transport use)?	Is any part of the site within 400m straight line distance of any community/commercial building? or will development provide a community/commercial building within walking distance of existing residential areas? - Are there opportunities to create new walking/cycling routes or improve existing routes?	YES - WITHIN 400 METRES OF POLICE HEADQUARTERS & A CHOICE OF RETAIL.	
3	Does the site provide an opportunity for you to provide a financial contribution towards encouraging more sustainable travel patterns?	For example, can a subsidy to a local bus route be provided?	CAN BE DISCUSSED AT DETAILED APPLICATION STAGE.	
4	Will the site involve "off site" road improvements that will contribute to road safety?	Is the site likely to improve the local road network such as junctions or crossings?	IF A TRANSPORT STATEMENT IS REQUIRED WITH A PLANNING APPLICATION, OPPORTUNITIES CAN BE CONSIDERED.	
5	Is there scope for road	Will development incorporate on-site traffic	SUBJECT TO DETAILED PROPOSAL	

	safety measures as part of the development of the site?	calming measures (e.g. speed bumps) or street lighting? Will it incorporate the principles of Designing Streets available via: <a href="http://www.scotland.gov.uk/Publications/2010/03/22120652/0">http://www.scotland.gov.uk/Publications/2010/03/22120652/0</a>		
6	Is the site near any existing "bad neighbour" uses?	Will the site be negatively affected by any neighbouring use? (bad neighbour uses include those that affect residential property by way of fumes, vibration, noise, artificial lighting etc). Is the site affected by any of the Physical Constraints identified in the Council's Physical Constraints: Supplementary Guidance?	NO	
7	Are there any contaminated land issues affecting the site?	Are you aware if the site has been previously used for industrial or any other uses likely to cause contamination?	NO.	
8	a) Is the site on derelict, vacant or other land that has previously been used?  b) Is the site on greenfield land?	a) Has the site been identified in Scottish Government's Vacant and Derelict Land Survey (which can be found here: <a href="http://scotland.gov.uk/Publications/2010/01/26135819/0">http://scotland.gov.uk/Publications/2010/01/26135819/0</a> ) or has the land got an existing use?  b) Will the site be located on presently undeveloped land e.g. presently or capably used for agriculture, forestry or amenity purposes?	NO.  YES.	
9	Is the site within the current settlement boundary?	Is the site within any identified settlement boundary in the Local Plan? Is it allocated for any uses?	YES	
10	Will the site affect the distinctiveness and special qualities of the present landscape character or affect any landscape designation?	Does the site conform with the Landscape Capacity Assessment (if available)? Will the site result in the removal of valued landscape features or negatively affect any key views? Is it located within or would otherwise affect a National Scenic Area or Special Landscape Area, having regard to their special qualities?	NO	

11	Will the site affect any areas with qualities of wildness? (that is land in its original natural state?)	Are you aware if the site is inside or likely to affect an area of Wild Land? (These areas are identified on Map 3 of SNH's Policy Statement, Wildness in Scotland's Countryside) and areas of Remote Coast identified by the Council, or an area of wildness identified in the draft Wild Land Supplementary Guidance?	NO	
12	Will the site affect a conservation area?	Is the site inside or likely to affect the character of a confirmed Conservation Area?	NO	
13	Will the site impact on any listed building and/or its setting?	Is there a listed building or a part of the setting "area" of a listed building within the site?	NO	
14	Will the site affect a site identified in the Inventory of Gardens and Designed Landscapes?	Is any part of the site inside the outer boundary of an Inventory "entry" or will the site affect the setting of an "entry"?	NO	
15	Will the site affect any locally important archaeological sites identified in the Historic Environment Record?	Does the site contain any features identified in the HER? If yes, will the site affect the feature?	NO	
16	Will the site impact on any Scheduled (Ancient) Monument and/or its setting?	Is there any SAM within the site boundary or will a SAM be affected?	NO	
17	a) Will the site affect any natural heritage designation or area identified for its importance to nature conservation?  b) Will the site affect any other important habitat for the natural heritage?	a) Is any part of the site inside or likely to affect the designation (SAC, SPA, SSSI, NNR, Ramsar) or Local Nature Conservation Site?  b) Is any part of the site within or likely to affect non-statutory features identified as being of nature conservation importance e.g.	NO  NO	

		Ancient, Semi-Natural or Long-Established Woodland Inventory sites, priority BAP habitats, habitats included on the Scottish Biodiversity List, non-designated habitats listed in Annex 1 of EC Habitats Directive?		
18	a) Will the site affect any protected species?  b) Will the site affect any other important species for the natural heritage?	a) Will the site affect any European Protected Species, Badgers and species (birds, animals and plants) protected under the Wildlife and Countryside Act 1981 as amended. If such a species may be present on or near the site, a survey should be carried out to inform this assessment (for which a licence from SNH may be required)  b) Will the site affect species listed in the UK and Local BAPs, the Scottish Biodiversity List and relevant annexes of the EC Habitats Directive?	NO  NO	
19	Is the site proposed to provide any form of renewable energy?	For example, will the site provide or be capable of providing a district heating system, solar panels or a wind turbine?	CAN BE CONSIDERED AT DETAILED PLANNING APPLICATION STAGE .	
20	Is any part of the site at risk from fluvial or coastal flooding as shown on SEPA's flood map or from local knowledge?	Are you aware of any part of the site being within the 1 in 200 year flood risk contour as identified by SEPA? (which can be found here: <a href="http://www.sepa.org.uk/flooding/flood_risk_maps/view_the_map.aspx">http://www.sepa.org.uk/flooding/flood_risk_maps/view_the_map.aspx</a> )	NO .	
21	Will development of the site result in the need for changes in land form and level? If yes, how will soil and drainage issues be addressed?	Will there be any change in rate, quantity, quality of run-off plus groundwater impact on or off site? If so, will these affect priority habitats, especially blanket bog?	NO .	
22	Is there a watercourse, loch or sea within or adjacent to the site? If yes, how will the water	Will there be any culverting, diversion or channelling of existing watercourses?	NO	

	environment be protected from development?			
23	Will the site offer opportunities for sustainable waste management?	Will the waste produced by the site be minimised and processed close to source in a sustainable way?	YES - CAN BE ADDRESSED IN SITE WASTE MANAGEMENT PLAN .	
24	Can the site be connected to the public water and sewerage system?	Can the site be connected at reasonable cost? If not, what alternative is proposed?	YES	
25	Will the site require alteration to the local landform?	Can the site (including access) be developed without significant re-contouring etc.? Will access tracks and parking areas have significant cut and fill?	NO	
26	Will the site affect or be affected by coastal erosion or natural coastal processes?	This will be noted on any relevant shoreline management plan.	NO	
27	Is the site sheltered from the prevailing wind and does it have a principal aspect between SW and SE?	Will development make best use of the site in terms of energy efficiency?	YES	
28	Will the site have any impact upon local air quality?	Is the site near areas of employment or close to public transport? Such developments are less likely to result in additional traffic which may contribute to air pollution.	NO	
29	Will the site have an impact on light pollution levels?	Is it likely that the Council policy likely will require street lighting at this location? Are there proposals for floodlighting on the site?	LIGHTING CAN BE DESIGNED / ORIENTED TO AVOID DETRIMENT TO ADJOINING RESIDENTIAL PROPERTIES	
30	a) Will it the site affect the present green network of the area?	a) Will the site affect features that currently provide for the movement of species and/or people e.g. woodland, hedgerows, field margins, watercourses, coastlines, tree belts, greenspace?	PART OF SITE CURRENTLY CLASSIFIED AS OPEN SPACE	

	b) Will the site provide opportunities to enhance the present green network of the area?	b) Will connectivity of natural features or open space and paths used for public amenity be improved? Will existing fragmentation of habitats and open spaces be improved? Will species be enabled to move where at present there is an obstacle?	NO	
31	Will the site provide opportunities for people to come into contact with and appreciate nature/natural environments?	Is the site close to (within 1.5km) an opportunity to come into contact with nature/natural environments e.g. Local Nature Reserves, local greenspace, green networks? Are there proposals which will increase opportunities to come into contact with nature/natural environments?	NO	
32	a) Will the site affect any core paths or right of way?  b) Will the site affect any other existing paths or outdoor access opportunities?  c) Will the allocation provide new access opportunities within the site and linking to the path network beyond the site?	a) Is a diversion of a core path or right of way required? Will there be any impact on the usability of a core path or right of way?  b) Will it affect an existing path in the Highland Path Record? Will it provide additional access opportunities or adversely affect access opportunities afforded by the Land Reform (Scotland) Act 2003?  c) Will new paths be created within and beyond the site? Will any existing paths be improved e.g. to increase accessibility to a wider range of users? Will the site help to realise priorities identified in the Council's outdoor access strategy or aspirational paths identified in the core path plans?	NO  NO  NO	
33	Will the site have an impact on the geodiversity of the area?	Are you aware if the site lies within or adjacent to an un-notified Geological Conservation Review site or Local Geodiversity Site? (or other site with geodiversity value e.g. distinctive landforms, areas with natural processes, rock exposures for study?)	NO	

34	Will soil quality and capability of the site be adversely affected?	Will the site result in a loss of soil due to development or removal of good quality soil from the site? Is the site on land identified as Prime Quality Agricultural Land?	NO	
35	Is the site on peatland?	Is the site within or functionally connected to an area of peatland? Would the allocation involve the disturbance of peat? If yes, how would impacts on peatland be avoided or minimised? Would any tree felling be required?	NO	
36	Will the site have any affect on the viability of a crofting unit?	Does the site represent a significant loss of good quality inbye crofting land or common grazing land?	NO.	